

United States Bankruptcy Court  
Middle District of Pennsylvania

In re:  
Joseph Wongbe Cooper  
Wanda Lynn Cooper  
Debtors

Case No. 21-02689-MJC  
Chapter 13

District/off: 0314-5  
Date Rcvd: Jan 24, 2022

User: AutoDocke  
Form ID: pdf002

Page 1 of 3  
Total Noticed: 36

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
++	Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. § 342(f)/Fed. R. Bank. P. 2002(g)(4).

## CERTIFICATE OF NOTICE

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 26, 2022:**

Recip ID	Recipient Name and Address
db/jdb	+ Joseph Wongbe Cooper, Wanda Lynn Cooper, 106 Reston Dr, East Stroudsburg, PA 18301-6929
5452132	Apotheker Scian PC, 520 Fellowship Road, Suite C306, PO Box 5496, Mt Laurel, NJ 08054-5496
5452133	+ Bank of America, 4909 Savarese Circle, Tampa, FL 33634-2413
5452136	Carrington Mortgage Services, 2201 East 196th Street, Westfield, IN 46074
5452138	+ Consumer Portfolio Services, 19500 Jamboree Rd, Suite 500, Irvine, CA 92612-2437
5452141	+ Edwin A. Abrahamson & Assoc., PC, 120 N. Keyser Ave, Scranton, PA 18504-9701
5452142	+ Fedloan Servicing, POB 60610, Harrisburg, PA 17106-0610
5452149	+ Nicholas Charles Haros, Esquire, Young & Haros, LLC, 802 Main Street, Stroudsburg, PA 18360-1602
5452150	+ Penn Estates Property Owners Assoc, 304 Cricket Drive, East Stroudsburg, PA 18301-8996
5452153	Select Portfolio Servicing, Inc, 3815 South West Temple St, Salt Lake City, UT 84115-4412
5452154	+ Select Portfolio Servicing, Inc., 10401 Deerwood Park BV, Jacksonville, FL 32256-5007
5452157	+ US Bank, NA, Trustee, c/o BAC, MC: CA6-914-01-43, 1800 Tapo Canyon Road, Simi Valley, CA 93063-6712
5452158	+ WebBank/Fingerhut, 13300 Pioneer Trail, Eden Prairie, MN 55347-4120
5452159	+ Xcel Federal Credit Union, 1460 Broad Street, Bloomfield, NJ 07003-3014

TOTAL: 14

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Jan 24 2022 18:45:00	AmeriCredit Financial Services, Inc. dba GM Financ, P O Box 183853, Arlington, TX 76096-3853
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Jan 24 2022 18:46:11	Capital One Auto Finance, a division of Capital On, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
5453551	Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Jan 24 2022 18:45:00	Americredit Financial Services, Inc., Dba GM Financial, P O Box 183853, Arlington, TX 76096
5452137	+ Email/Text: GenesisFS@ebn.phinsolutions.com	Jan 24 2022 18:45:00	CB Indigo/Celtic Bank, PO Box 4499, Beaverton, OR 97076-4499
5452134	+ Email/PDF: acg.coaf.ebn@aisinfo.com	Jan 24 2022 18:46:20	Capital One Auto Finance, CB Disputes Team PO Box 259407, Plano, TX 75025-9407
5452642	+ Email/PDF: acg.acg.ebn@aisinfo.com	Jan 24 2022 18:46:11	Capital One Auto Finance, a division of, AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
5452135	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 24 2022 18:46:11	Capital One Bank USA NA, PO Box 31293, Salt Lake City, UT 84131-0293
5455155	Email/Text: bankruptcy@consumerportfolio.com	Jan 24 2022 18:45:00	Consumer Portfolio Services, P.O. Box 57071, Irvine, CA 92619-7071
5452139	+ Email/PDF: creditonebknotifications@resurgent.com	Jan 24 2022 18:46:20	Credit One Bank, 6801 S. Cimarron Road, Las Vegas, NV 89113-2273

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5452140	Email/PDF: creditonebknotifications@resurgent.com	Jan 24 2022 18:46:30	Credit One Bank, PO Box 98872, Las Vegas NV 89193-8872
5452143	+ Email/Text: bnc-bluestem@quantum3group.com	Jan 24 2022 18:45:00	Fingerhut/Webbank, 6250 Ridgewood Road, St. Cloud, MN 56303-0820
5452144	+ Email/PDF: ais.fpc.ebn@aisinfo.com	Jan 24 2022 18:46:11	First Premier Bank, 3820 N Louise Ave, Tape Only, Sioux Falls, SD 57107-0145
5452145	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Jan 24 2022 18:45:00	GM Financial, PO Box 181145, Arlington, TX 76096-1145
5452146	Email/Text: sbse.cio.bnc.mail@irs.gov	Jan 24 2022 18:45:00	Internal Revenue Service, Centralized Insolvency Operation, PO Box 7346, Philadelphia PA 19101-7346
5454688	Email/PDF: resurgentbknotifications@resurgent.com	Jan 24 2022 18:46:12	LVNV Funding LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
5452147	+ Email/PDF: resurgentbknotifications@resurgent.com	Jan 24 2022 18:46:12	LVNV Funding, LLC, 55 Beattie Place, Greenville, SC 29601-5115
5452148	+ Email/Text: bankruptcy@sccompanies.com	Jan 24 2022 18:45:00	Midnight Velvet, 1112 7th Ave, Monroe, WI 53566-1364
5452151	Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com	Jan 24 2022 18:46:29	Portfolio Recovery, 120 Corporate Blvd Suite 100, Norfolk, VA 23502
5452152	+ Email/PDF: RACBANKRUPTCY@BBANDT.COM	Jan 24 2022 18:56:40	Regional Acceptance Corp., 1424 East Fire Tower Road, Greenville, NC 27858-4105
5452780	Email/PDF: RACBANKRUPTCY@BBANDT.COM	Jan 24 2022 18:56:40	Regional Acceptance Corporation, PO Box 1847, Wilson, NC 27894-1847
5452155	+ Email/Text: Atlanticus@ebn.phinsolutions.com	Jan 24 2022 18:45:00	TBOM/Fortiva MC, PO Box 105555, Atlanta, GA 30348-5555
5452156	+ Email/Text: GenesisFS@ebn.phinsolutions.com	Jan 24 2022 18:45:00	The Bank of Missouri/Milstne, PO Box 4499, Beaverton, OR 97076-4499

TOTAL: 22

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
5455134	*P++	AMERICREDIT FINANCIAL SERVICES DBA GM FINANCIAL, PO BOX 183853, ARLINGTON TX 76096-3853, address filed with court;, AmeriCredit Financial Services, Inc., dba GM Financial, P O Box 183853, Arlington, TX 76096
5452643	*+	Capital One Auto Finance, a division of, AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901

TOTAL: 0 Undeliverable, 2 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 26, 2022

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 24, 2022 at the address(es) listed below:

Name	Email Address
J. Zac Christman	on behalf of Debtor 1 Joseph Wongbe Cooper zac@fisherchristman.com office@fisherchristman.com
J. Zac Christman	on behalf of Debtor 2 Wanda Lynn Cooper zac@fisherchristman.com office@fisherchristman.com
Jack N Zaharopoulos (Trustee)	TWecf@pamd13trustee.com
Rebecca Ann Solarz	on behalf of Creditor THE BANK OF NEW YORK MELLON F/K/A The Bank of New York as trustee for registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2006-3 bkgroup@kmllawgroup.com
United States Trustee	ustpregion03.ha.ecf@usdoj.gov

TOTAL: 5

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:  
JOSEPH WONGBE COOPER, and  
WANDA LYNN COOPER,**

## Debtors

CHAPTER 13

CASE NO. 5:21-bk-02

## X ORIGINAL PLAN

AMENDED PLAN (Indicate 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, etc.)

#### 4 Number of Motions to Avoid Liens

## 1 Number of Motions to Value Collateral

## CHAPTER 13 PLAN

## NOTICES

Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked or if neither box is checked, the provision will be ineffective if set out later in the plan.

1	The plan contains nonstandard provisions, set out in § 9, which are not included in the standard plan as approved by the U.S. Bankruptcy Court for the Middle District of Pennsylvania.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
2	The plan contains a limit on the amount of a secured claim, set out in § 2.E, which may result in a partial payment or no payment at all to the secured creditor.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
3	The plan avoids a judicial lien or nonpossessory, nonpurchase-money security interest, set out in § 2.G.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included

**YOUR RIGHTS WILL BE AFFECTED**

**READ THIS PLAN CAREFULLY.** If you oppose any provision of this plan, you must file a timely written objection. This plan may be confirmed and become binding on you without further notice or hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the plan.

#### **1. PLAN FUNDING AND LENGTH OF PLAN.**

#### A. Plan Payments From Future Income

1. To date, the Debtor paid **\$ 0** (enter \$0 if no payments have been made to the Trustee to date). Debtor shall pay to the Trustee for the remaining term of the plan the following payments. If applicable, in addition to monthly plan payments, Debtor shall make conduit payments through the Trustee as set forth below. The total base plan is **\$ 13,380**, plus other payments and property stated in § 1B below:

Start mm/yyyy	End mm/yyyy	Plan Payment	Estimated Conduit Payment	Total Monthly Payment	Total Payment Over Plan Tier
01/2022	12/2026	\$ 223	N/A	\$ 223	\$ 13,380
				Total Payments:	\$ 13,380

2. If the plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payments and the plan funding. Debtor must pay all post-petition mortgage payments that come due before the initiation of conduit mortgage payments.

3. Debtor shall ensure that any wage attachments are adjusted when necessary to conform to the terms of the plan.

4. CHECK ONE: ( X ) Debtor is at or under median income. *If this line is checked, the rest of § 1.A.4 need not be completed or reproduced.*

#### B. Additional Plan Funding From Liquidation of Assets/Other

1. The Debtor estimates that the liquidation value of this estate is \$ 0. (Liquidation value is calculated as the value of all non-exempt assets after the deduction of valid liens and encumbrances and before the deduction of Trustee fees and priority claims.)

*Check one of the following two lines.*

X No assets will be liquidated. *If this line is checked, the rest of § 1.B need not be completed or reproduced.*

#### 2. SECURED CLAIMS.

##### A. Pre-Confirmation Distributions. Check one.

X None. *If "None" is checked, the rest of § 2.A need not be completed or reproduced.*

##### B. Mortgages (Including Claims Secured by Debtor's Principal Residence) and Other Direct Payments by Debtor. Check one.

  None. *If "None" is checked, the rest of § 2.B need not be completed or reproduced.*

Payments will be made by the Debtor directly to the creditor according to the original contract terms, and without modification of those terms unless otherwise agreed to by the contracting parties. All liens survive the plan if not avoided or paid in full under the plan.

Name of Creditor	Description of Collateral	Last Four Digits of Account Number
Carrington Mortgage Services	Debtors' Residence at 106 Reston Drive, East Stroudsburg, PA 18301	2978
Regional Acceptance Corp.	2019 Hyundai Tucson	0000

**C. Arrears, including, but not limited to, claims secured by Debtor's principal residence.** Check one.

None. If "None" is checked, the rest of § 2.C need not be completed or reproduced.

— The Trustee shall distribute to each creditor set forth below the amount of arrearages in the allowed proof of claim. If post-petition arrears are not itemized in an allowed claim, they shall be paid in the amount stated below. Unless otherwise ordered, if relief from the automatic stay is granted as to any collateral listed in this section, all payments to the creditor as to that collateral shall cease, and the claim will no longer be provided for under § 1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre-petition Arrears to be Cured	Estimated Post-petition Arrears to be Cured	Estimated Total to be paid in plan

**D. Other secured claims (conduit payments, claims for which a § 506 valuation is not applicable, etc.)**

None. If "None" is checked, the rest of § 2.D need not be completed or reproduced.

**E. Secured claims for which a § 506 valuation is applicable. Check one.**

— None. If "None" is checked, the rest of § 2.E need not be completed or reproduced.

Claims listed in the subsection are debts secured by property not described in § 2.D of this plan. These claims will be paid in the plan according to modified terms, and liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under § 1328 of the Code. The excess of the creditor's claim will be treated as an unsecured claim. Any claim listed as "\$0.00" or "NO VALUE" in the "Modified Principal Balance" column below will be treated as an unsecured claim. The liens will be avoided or limited through the plan or Debtor will file an adversary action (select method in last column). To the extent not already determined, the amount, extent or validity of the allowed secured claim for each claim listed below will be determined by the court at the confirmation hearing. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Value of Collateral (Modified Principal)	Interest Rate	Total Payment	Plan, Adversary or Other Action
Select Portfolio Servicing, Inc.	Debtors' Residence	NO VALUE	0%	\$ 0	Plan
Penn Estates Property Owners Association	Debtors' Residence	\$1,500	15%	\$ 2,140.80	Plan

**F. Surrender of Collateral. Check one.**

None. If "None" is checked, the rest of § 2.F need not be completed or reproduced.

**G. Lien Avoidance. Do not use for mortgages or for statutory liens, such as tax liens. Check one.**

None. If "None" is checked, the rest of § 2.G need not be completed or reproduced.

The Debtor moves to avoid the following judicial and/or nonpossessory, non-purchase money liens of the following creditors pursuant to § 522(f) (this § should not be used for statutory or consensual liens such as mortgages).

Name of Lien Holder.	Capital One Bank USA, NA	LVNV Funding, LLC	Penn Est. Property Owners Assoc.
Lien Description. (For a judicial lien, include court and docket number.)	Monroe County 2009-CV-9844	Monroe County 2011-CV-10837	Monroe County 2018-CV-9347
Description of the liened property.	Debtors' Residence	Debtors' Residence	Debtors' Residence
Liened Asset Value	\$ 162,500	\$ 162,500	\$ 162,500
Sum of Senior Liens	\$ 186,148	\$ 186,148	\$ 186,148
Exemption Claimed	N/A	N/A	N/A
Amount of Lien	\$ 6,199.49	\$ 9,221.07	\$ 3,001.74
Amount Avoided	\$ 6,199.49	\$ 9,221.07	\$ 3,001.74

### 3. PRIORITY CLAIMS.

#### A. Administrative Claims

1. Trustee's Fees. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.
2. Attorney's fees. Complete only one of the following options:
  - a. In addition to the retainer of \$1,000 already paid by the Debtor, the amount of \$3,500 in the plan. This represents the unpaid balance of the presumptively reasonable fee specified in L.B.R. 2016-2(c); or
  - b. \$ \_\_\_\_\_ per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between the Debtor and the attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to L.B.R. 2016-2(b).
3. Other. Other administrative claims not included in §§ 3.A.1 or 3.A.2 above.  
*Check one of the following two lines.*

None. *If "None" is checked, the rest of § 3.A.3 need not be completed or reproduced.*

#### B. Priority Claims (including certain Domestic Support Obligations).

Allowed unsecured claims, entitled to priority under § 1322(a) will be paid in full unless modified under § 9.

Name of Creditor	Estimated Total Payment
US Internal Revenue Service	\$ 5,568

**C. Domestic Support Obligations assigned to or owed to a governmental unit under 11 U.S.C. §507(a)(1)(B). Check one of the following two lines.**

X None. If "None" is checked, the rest of § 3.C need not be completed or reproduced.

**4. UNSECURED CLAIMS**

**A. Claims of Unsecured Nonpriority Creditors Specially Classified. Check one of the following two lines.**

X None. If "None" is checked, the rest of § 4.A need not be completed or reproduced.

**B. Remaining allowed unsecured claims will receive a pro-rata distribution of funds remaining after payment of other classes.**

**5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES. Check one of the following two lines.**

X None. If "None" is checked, the rest of § 5 need not be completed or reproduced.

**6. VESTING OF PROPERTY OF THE ESTATE.**

**Property of the estate will vest in the Debtor upon**

*Check the applicable line:*

- X plan confirmation.
- entry of discharge.
- closing of case:

**7. DISCHARGE: (Check one)**

- (X) The debtor will seek a discharge pursuant to § 1328(a).
- ( ) The debtor is not eligible for a discharge because the debtor has previously received a discharge described in § 1328(f).

## **8. ORDER OF DISTRIBUTION:**

If a pre-petition creditor files a secured, priority or specially classified claim after the bar date, the Trustee will treat the claim as allowed, subject to objection by the Debtor.

Payments from the plan will be made by the Trustee in the following order:

Level 1	Adequate protection payments	\$ -0-	
Level 2	Debtor's attorney's fees.	<b>\$ 3,500</b>	
Level 3	Domestic Support Obligations	<b>\$ -0-</b>	
Level 4	Priority claims, pro rata	<b>\$ 5,568</b>	
Level 5	Secured claims, pro rata	<b>\$ 2,140.80</b>	
Level 6	Specially classified unsecured claims	<b>\$ -0-</b>	
Level 7	General unsecured claims	<b>\$ 966.20</b>	
Level 8	Untimely filed unsecured claims to which the debtor(s) has/have not objected.	<b>\$ -0-</b>	
	Subtotal		<b>\$ 12,175</b>
	Trustee Commission (Estimated at 9%)	<b>\$ 1,205</b>	
	Total		<b>\$ 13,380</b>

*If the above Levels are filled in, the rest of § 8 need not be completed or reproduced.*

## **9. NONSTANDARD PLAN PROVISIONS**

**Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the plan is void. (NOTE: The plan and any attachment must be filed as one document, not as a plan and exhibit.)**

- A.** This Plan contains a chart in Section 8, above, that contains estimated distributions to each class of creditors, in addition to all other items required by the Model Plan.
- B.** Confirmation of this Plan shall constitute a finding that the real property known as **16 Reston Drive, East Stroudsburg, Monroe County, Pennsylvania**, hereinafter referred to as the "Property", shall a value of \$ 162,500, for all purposes.
- C.** This Plan avoids the second lien position mortgage held and/or serviced by **Select Portfolio Servicing, Inc.**, its successors, predecessors and assigns, hereinafter referred to as "Lender."
  1. Confirmation of this Plan shall constitute a determination that Lender has no secured claim.
  2. Upon entry of an Order Confirming this Plan, or Order Approving this Plan as the Confirmed Plan, as Modified, the entire balance owed to Lender shall be deemed a general unsecured claim without further Order of this Court, provided that:
    - (a) Lender's claim, upon the filing of a valid and timely Proof of Claim, shall be allowed as a non-priority general unsecured claim and may share in any distribution to general unsecured creditors.

- (b) The avoidance of Lender's junior lien is contingent upon the Debtors' completion of the Chapter 13 Plan and receipt of a Chapter 13 Discharge.
  - (c) Upon receipt of the Debtors' Chapter 13 discharge and completion of Debtors' Chapter 13 Plan, Lender shall within a reasonable time arrange to have the second lien position mortgage marked "satisfied" with the **Monroe** County Recorder of Deeds'
  - (d) Lender shall retain its lien for the full amount due under the subject loan should the property be sold or should a refinance take place prior to the completion of the Chapter 13 Plan and entry of a Discharge.
  - (e) Lender shall retain its lien for the full amount due under the subject loan in the event of either the dismissal of the Debtor's Chapter 13 case or the conversion of the case to another Chapter under the United States Bankruptcy Code.
  - (f) In the event that any entity, including the holder of the first lien on the Property, forecloses on its security interest and extinguishes Lender's lien prior to the Debtor's completion of the Chapter 13 Plan and receipt of a Chapter 13 Discharge, Lender's lien shall attach to the surplus proceeds of the foreclosure sale for the full amount of the subject loan balance at the time of the sale.
  - (g) In the event that the property is destroyed or damaged, pursuant to the terms of the mortgage, Lender is entitled to its full rights as a loss payee with respect to the insurance proceeds and has a security interest in such proceeds up to the entire balance due on the mortgage.
  - (h) Each party shall bear their own attorneys' fees and costs incurred in this matter.
4. The Confirmation Order, the last Order Granting Motion to Modify Confirmed Plan, and Discharge Order may be filed with the Recorder of Deeds in and for **Monroe** County, Pennsylvania, which shall satisfy and avoid the mortgage held by Lender against the Property, as recorded at **Monroe** County Record Book Volume 2257, Page 2374.
- D. This Plan provides for the avoidance of the entirety of the judgment lien of **Capital One Bank USA, NA**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe** County to demonstrate the judgment lien of **Capital One Bank USA, NA**, was avoided.
- E. This Plan provides for the avoidance of the entirety of the judgment lien of **LVNV Funding, LLC**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe** County to demonstrate the judgment lien of **LVNV Funding, LLC**, was avoided.
- F. This Plan provides for the avoidance of the entirety of the judgment lien of **Penn Est. Property Owners Assoc.**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe** County to demonstrate the judgment lien of **Penn Est. Property Owners Assoc.**, was avoided

Dated: December 19, 2021

/s/ J. Zac Christman  
J. Zac Christman, Esquire, Attorney for Debtor

/s/ Joseph Wongbe Cooper  
**JOSEPH WONGBE COOPER**, Debtor

/s/ Wanda Lynn Cooper  
**WANDA LYNN COOPER**, Joint Debtor

By filing this document, the debtor, if not represented by an attorney, or the Attorney for Debtor also certifies that this plan contains no nonstandard provisions other than those set out in § 9.